

*Reply to:*  
Paul Thanasides  
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February 15, 2023

**VIA ECF ONLY**

Hon. Brian M. Cogan, U.S.D.J.  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Full Circle United, LLC v. Bay Tek Entertainment, Inc.*, No. 1:20-cv-03395-BMC

Dear Judge Cogan,

We write, as counsel for Plaintiff-Counterclaim Defendant Full Circle United, LLC and Counterclaim Defendant Eric Pavony (together, “FCU”), to request a 14-day extension of time, from March 1 to March 15, 2023, to file response papers to Bay Tek Entertainment, Inc.’s (“Bay Tek”) Motion for Summary Judgment (“MSJ”). This is FCU’s second request for such an extension, the first of which was granted. Bay Tek consents to this request, so long as it is acceptable to the Court.

FCU’s counsel has recently been impacted by two deaths of those close to them. The death of a partner at McIntyre Thanasides Bringgold Elliott Grimaldi Guito & Matthews, P.A. has required the undersigned to step into his practice for the foreseeable future. Another member of FCU’s counsel just lost an immediate family member. Both have and continue to impede FCU’s counsel’s ability to devote its full time to its response papers. FCU therefore respectfully requests additional time to finalize and file its response to the MSJ.

Accordingly, FCU, through undersigned counsel, respectfully requests an additional 14 days to respond to the MSJ, until March 15, 2023. We thank Your Honor for your consideration of this matter.

Respectfully submitted,

/s/ Paul Thanasides  
Paul Thanasides

cc: All counsel of record (via ECF)

